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To: Mr. Peter A. Tenhula

Fax: 202-418-2820

From: Dr. Joel Cohen

Date: 02/10/00

Re: WT Docket No. 97-207;

Pages: 3

CC:

☐ Urgent

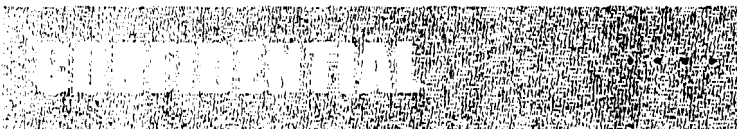
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**CANISIUS COLLEGE**

2001 MAIN STREET • BUFFALO, NEW YORK 14208-1098

Information Technology Services

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February 10, 2000

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207:
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Canisius College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Canisius College to significant financial liability that would undermine our ongoing effort to provide educational services.

Canisius College currently has over 4,400 students and 875 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party. We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution

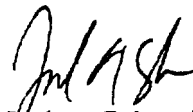
February 10, 2000

will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Canisius College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Joel A. Cohen, Ph. D.

Director of Information Technology Services

cc Mr. Peter A. Tenhula
Senior Legal Advisor to Commissioner Powell



SUNSHINE PERIOD

F a c s i m i l e

Date: 2-10-00
From: Cindy Phillips
To (name): Michael K. Powell
To (number): (202) 418-2820
No. Of Pages: 3

Comments: _____



NIUTEL - The Telecommunications Center
Northern Illinois University
DeKalb, IL 60115
Phone 815-753-1227
Fax: 815-753-0198



**NORTHERN
ILLINOIS
UNIVERSITY**

**Commissioner Michael K Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, S.W.
Washington, DC 20554**

**Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services**

Dear Commissioner Powell :

**NIUTEL-
TELECOMMUNICATIONS
SERVICES**

**DEKALB, ILLINOIS
60115-2854**

(815) 753 1227

**FAX
(815) 753-0198**

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Northern Illinois University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Northern Illinois University to significant financial liability that would undermine our ongoing effort to provide educational services.

Northern Illinois University currently has over 22,000 students and 3500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or



NORTHERN
ILLINOIS
UNIVERSITY

NIUTEL-
TELECOMMUNICATIONS
SERVICES

DEKALB, ILLINOIS
60115-2854

(815) 753-1227

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(815) 753-0198

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

A handwritten signature in cursive script that reads "Cindy J. Phillips".

Cindy J. Phillips
Director, Telecommunications Services
Northern Illinois University

SUNSHINE PERIOD

To: Commissioner Michael K. Powell

Phone: _____

FAX: (202) 418-2820From: Dorothy ChrismerPhone: (301) 405-4400

Office of Information Technology
Patuxent Building #010
University of Maryland
College Park, MD 20742-4911
Phone: 301-405-4402
FAX: 301-314-8080

Number of Pages (including cover sheet): 3

Comments:



UNIVERSITY OF
MARYLAND
OFFICE OF INFORMATION TECHNOLOGY

College Park, Maryland 20742
301.405.7700 TEL 301.405.0720
www.oit.umd.edu

February 10, 2000

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service
Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, the University of Maryland, College Park has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University of Maryland to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of Maryland, College Park currently has over 33,000 full time students and 7,000 full and part time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by Networking and Telecommunications Services. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

Page 2
Calling Party Pays
February 10, 2000

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Sincerely,



Dorothy Chrismer
Acting Executive Director
Networking and Telecommunications Services
University of Maryland at College Park

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

.....

fax cover sheet: OIT

SUNSHINE PERIOD

To: Peter A. Tenhula

Phone: _____

FAX: (202) 418-2820

From: Dorothy Chrismer

Phone: (301) 405-4400

Office of Information Technology
Patuxent Building #010
University of Maryland
College Park, MD 20742-4911
Phone: 301-405-4402
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Commissioner Michael K. Powell
Federal Communications Commission
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445 Twelfth Street, S.W.
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Sincerely,



Dorothy Chrismer
Acting Executive Director
Networking and Telecommunications Services
University of Maryland at College Park

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

.....



LIPSCOMB
UNIVERSITY

VICE PRESIDENT FOR
QUALITY AND
TECHNOLOGY
(615) 269-1777
FAX: (615) 269-1809

From: Lipscomb University
3901 Granny White Pike
Nashville, TN 37204-3951
FAX: (615) 269-1809

SUNSHINE PERIOD

FAX COVER PAGE

Page 1 of 3

Date 2-10-2000

Submitted by: Richard W. Kulp

To: Commissioner Michael K. Powell
Federal Communications Commission

FAX: 202-418-2820

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VICE PRESIDENT FOR
QUALITY AND
TECHNOLOGY
(615) 269-1777
FAX: (615) 269-1809

February 9, 2000

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Lipscomb University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Lipscomb University to significant financial liability that would undermine our ongoing effort to provide educational services.

Lipscomb University currently has over 4100 students from kindergarten through graduate school and 500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the Computer Center. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

Commissioner Powell

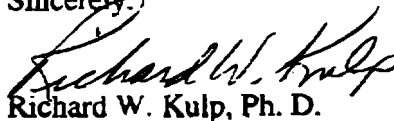
page 2

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Sincerely,



Richard W. Kulp, Ph. D.

Vice President for Quality and Technology

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell



VICE PRESIDENT FOR
QUALITY AND
TECHNOLOGY
(615) 269-1777
FAX: (615) 269-1809

From: Lipscomb University **SUNSHINE PERIOD**
3901 Granny White Pike
Nashville, TN 37204-3951
FAX: (615) 269-1809

FAX COVER PAGE

Page 1 of 3 Date 2-10-2000

Submitted by: Richard W. Kulp

To: Mr. Peter A. Tenhula

Senior Legal Advisor to Commissioner Powell

FAX: 202-418-2820

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Ask for jonna

Notes:

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(615) 269-1777
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February 9, 2000

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

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Commissioner Powell

page 2

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Sincerely,



Richard W. Kulp, Ph. D.

Vice President for Quality and Technology

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell



OSWEGO

STATE UNIVERSITY OF NEW YORK
OSWEGO, NEW YORK 13126

February 10, 2000

Mr. Michael K. Powell
Commissioner
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554

SUNSHINE PERIOD

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Commissioner Powell:

I am Jerry DeSantis, Interim Vice President of Finance and Administration at Oswego State University of New York. As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Oswego State has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose our University to significant financial liability that would undermine our ongoing effort to provide educational services.

Oswego State University of New York currently has nearly 8,000 students and 1,000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls (which will bill for) and calls to pay-per-call services (i.e., calls to "900" numbers, which we block), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX requests an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of billing as toll calls scheme (i.e. different rate plans, roaming charges etc.) we will not be able to accurately rebill the calling party at the time the call is placed. Given the

transient nature of our students (a normal 25% turnover annually) the caller may not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Oswego State. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Jerry DeSantis



Illinois College of Optometry

SUNSHINE PERIOD

Information Systems Department

Facsimile

To: *Commissioner Michael K. Powell*

OF:

Fax: *202-418-2820*

Phone:

From:

Phone:

Fax:

Pages: *3*, including this cover sheet

Date:

Comments:

For information please contact

Craig Michalak
Director of Information Systems
The Illinois College of Optometry
Phone: 312 949-7505
Fax: 312 949-7350
Email cmichala@eyecare.ico.edu



Illinois College of Optometry

3241 South Michigan Avenue • Chicago, Illinois 60616-3878 • Phone: (312) 225-1700

February 10, 2000

Commissioner Michael K. Powell
Federal Communications Commission Office
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554
Fax (202) 418-2820

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services.

Dear Commissioner Powell,

As a member of ACUTA: The Association of Telecommunications Professionals in Higher Education, Illinois College of Optometry has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Illinois College of Optometry to significant financial liability that would undermine our ongoing effort to provide educational services.

Illinois College of Optometry currently has over 600 students and 200 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.


We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the Illinois College of Optometry. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written

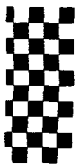
comments and oral presentations in this proceeding. The most efficient, cost effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next generation equipment that could distinguish CPP calls without identifiable numbering.

As a nonprofit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a matter that will take into account the needs of all affected parties.

Sincerely,



Craig Michalak
Director of Information Systems

**Oswego State University****Telecommunications Department SUNSHINE PERIOD****101 Culkin Hall #26****Oswego, New York 13126****FAX**Date: 2-10-00Number of pages including cover sheet: 3**To:**FCCPhone: { } -Fax phone: { } -CC: **From:**William GruszkaPhone: (315) 341 - 5500Fax phone: (315) 341 - 5799**REMARKS:**☐ Urgent☐ For your review☐ Reply ASAP☐ Please comment



OSWEGO

STATE UNIVERSITY OF NEW YORK
OSWEGO, NEW YORK 13126

February 10, 2000

Mr. Michael K. Powell
Commissioner
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Commissioner Powell:

I am Bill Gruszka, Director of Telecommunications at Oswego State University of New York. As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Oswego State has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose our University to significant financial liability that would undermine our ongoing effort to provide educational services.

Oswego State University of New York currently has nearly 8,000 students and 1,000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls (which will bill for) and calls to pay-per-call services (i.e., calls to "900" numbers, which we block), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX requests an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of billing as toll calls scheme (i.e. different rate plans, roaming charges etc.) we will not be able to accurately rebill the calling party at the time the call is placed. Given the transient nature of our students (a normal 25% turnover annually) the caller may

not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Oswego State. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,


William Gruszka

Director, Telecommunications



STATE UNIVERSITY OF NEW YORK
TELECOMMUNICATIONS OFFICERS ASSOCIATION

February 10, 2000

Mr. Michael K. Powell
Commissioner
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial
Mobile Radio Services

Dear Commissioner Powell:

I am Bill Gruszka, Director of Telecommunications at Oswego State University of New York. This year I am also serving as Chair of the Telecommunications Officers Association (TOA) for the State University of New York (SUNY) System. TOA represents the 64 SUNY campuses, which include 71,000 faculty and staff and over 360,000 students. We all have unique Telecommunications needs but all share the problem of recharging calls made by users of our telephone systems.

As a members of ACUTA, the Association of Telecommunications Professionals in Higher Education, the campuses of the SUNY System have closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are non-profit educational institutions deeply concerned that without appropriate safeguards, CPP will expose our campuses to significant financial liability that would undermine our ongoing effort to provide educational services. With extensive telecommunications infrastructures accessible to such large numbers of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through centralized PBXs (or CENTREXs) controlled by the telecommunications departments. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls (which will bill for) and calls to pay-per-call services (i.e., calls to "900" numbers, which we block), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX requests an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of billing as toll calls scheme (i.e. different rate plans, roaming charges etc.) we will not be able to accurately rebill the calling party at the time the call is placed. Given the transient nature of our students (a

normal 25% turnover annually) the caller may not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Oswego State. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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Sincerely,



William Gruszka

Chair, Telecommunications Officer's Association for SUNY